

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	
v.)	MBD No. 22-MC-91322
)	
\$60,383 IN UNITED STATES)	
CURRENCY,)	
Defendant.)	

ASSENTED-TO MOTION TO EXTEND DEADLINE
FOR THE UNITED STATES TO FILE CIVIL FORFEITURE COMPLAINT

The United States of America, by its attorney, Rachael S. Rollins, United States Attorney for the District of Massachusetts, with the assent of the only person to identify themselves as a Claimant to date, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an extension of time to file a civil complaint against the following seized property:

- a. \$60,383 in United States currency, seized on October 4, 2021 currently being held in the District of Massachusetts (the “Currency”).

A proposed order is attached to this motion.

The Drug Enforcement Administration (“DEA”) seized the Currency and commenced administrative forfeiture proceedings. On or about April 4, 2022, the DEA received a claim for the Currency from Jorge Perez, through his attorney Nikolas Andreopoulos. No other claims were submitted. On or about April 11, 2022, the United States received copies of these claims from the DEA, and pursuant to 18 U.S.C. § 983(a)(3), a civil complaint must be filed against the Currency within 90 days after the claim was filed in administrative proceedings, which is July 3, 2022.

Pursuant to 18 U.S.C. § 983(a)(3)(A), the Court may extend the time to file a civil forfeiture action upon agreement of the parties. The undersigned Assistant United States Attorney requires additional time to review the seizure and claim of the Claimant, and conferred with counsel for the claimant on June 29, 2022 regarding this extension. The Claimant’s counsel assented to the

requested extension.

WHEREFORE, the United States respectfully requests that the Court grant its request and extend the deadline to file a civil forfeiture complaint for an additional 60 days, or until September 1, 2022.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Carol E. Head
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Dated: June 30, 2022

CERTIFICATE OF SERVICE

I, Carol E. Head, Assistant United State Attorney, certify that the foregoing motion filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and mailed to attorney Nikolas Andreopoulos.

/s/ Carol E. Head
CAROL E. HEAD
Assistant United States Attorney

Dated: June 30, 2022